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NREAD
11 Sep 87

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commanding Officer, Marine Corps Air Station, New River

Subj: HAZARDOUS WASTE MANAGEMENT COMPLIANCE INSPECTIONS

Ref: (a) BO 6240.5A
(b) CG, MCB 291625 Oct 86

Encl: (1) Hazardous Waste Management Inspection Report; Format
for
(2) Schedule of Hazardous Waste Inspections for Commands
aboard Marine Corps Air Station, New River

1. Reference (a) formally published the subject requirements which were initiated by reference (b). Enclosure (1) provides the format for future inspections. Enclosure (2) identifies organizations which will be inspected in the near future. Enclosure (2) was developed in cooperation with Ms. Mary Wheat, Hazardous Material Disposal Coordinator, Grounds Safety Office, Marine Corps Air Station, New River.

2. Please note that enclosure (1) stresses effectiveness of hazardous waste management activities of commanding officers and the Hazardous Material Disposal Officers. This is a departure from recent inspections conducted pursuant to reference (b) which focused on conditions at the various hazardous waste generation and storage sites.

3. Point of contact on this matter is Ms. Glenee Smith, Natural Resources and Environmental Affairs Division, at extensions 2083/1690.

JULIAN I. WOOTEN
By direction

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HAZARDOUS WASTE MANAGEMENT INSPECTION REPORT

DATE: _____

Organization being inspected: _____

Organization Point of Contact: _____

_____ Phone Number: _____

Name of inspector/other inspection participants/phone#: _____

1. Evaluation of the organizations Hazardous Waste Management Program:

a. Has the Commanding Officer published written hazardous waste management objectives, goals, policies and procedures?

_____ YES _____ NO

b. Has the Commanding Officer appointed a primary and at least one alternate Hazardous Material Disposal Officer (HMDO)?

_____ YES _____ NO

c. Has the Commanding Officer established internal controls to ensure ongoing compliance with BO 6240.5A? _____ YES

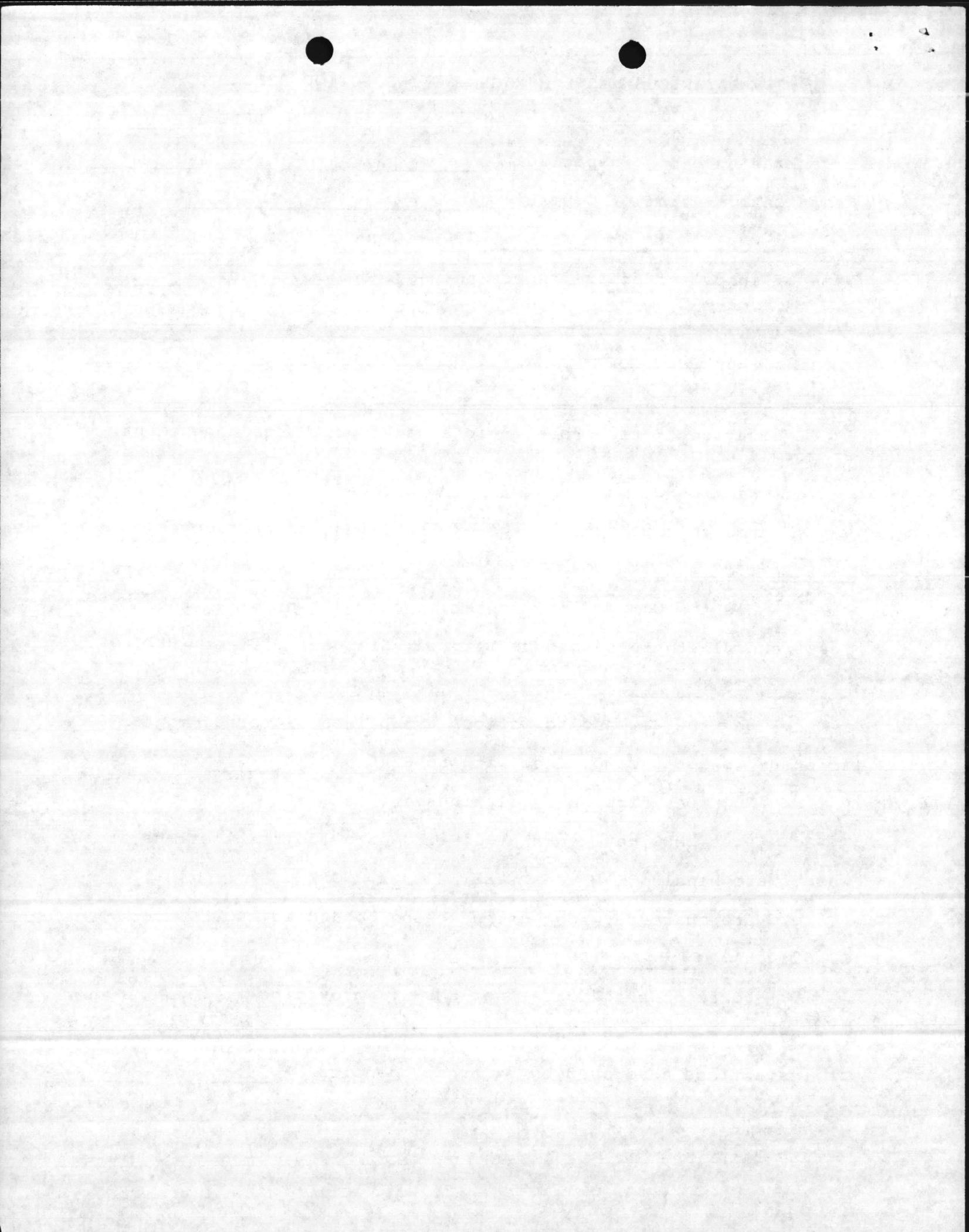
_____ NO (Describe how violations are handled)

d. Does HMDO have current listing of all sites where hazardous wastes are handled? _____ YES _____ NO

e. Are quarterly inspections being conducted by HMDO per BO 6240.5A? _____ YES _____ NO

f. Do records indicate that HMDO is providing follow up to correct discrepancies identified by either HMDO's inspections, or inspections conducted by external agencies? _____ YES _____ NO

ENCLOSURE (1)



g. Regarding Hazardous Waste Training:

(1) Are training and training records adequate and complete for all primary and alternate HMDO's? _____ YES _____ NO

(2) Does HMDO have a current roster of hazardous waste handlers and managers at each site where hazardous wastes are generated, stored or otherwise handled? _____ YES _____ NO

(3) Are current up-to-date training records available in HMDO's files for each hazardous waste handler and manager?
_____ YES _____ NO

(4) Have any personnel worked as a hazardous waste handler or manager without direct supervision prior to having required training? _____ YES _____ NO

(5) Are all personnel provided adequate hazardous waste training within six months of date assigned to hazardous waste duties? _____ YES _____ NO

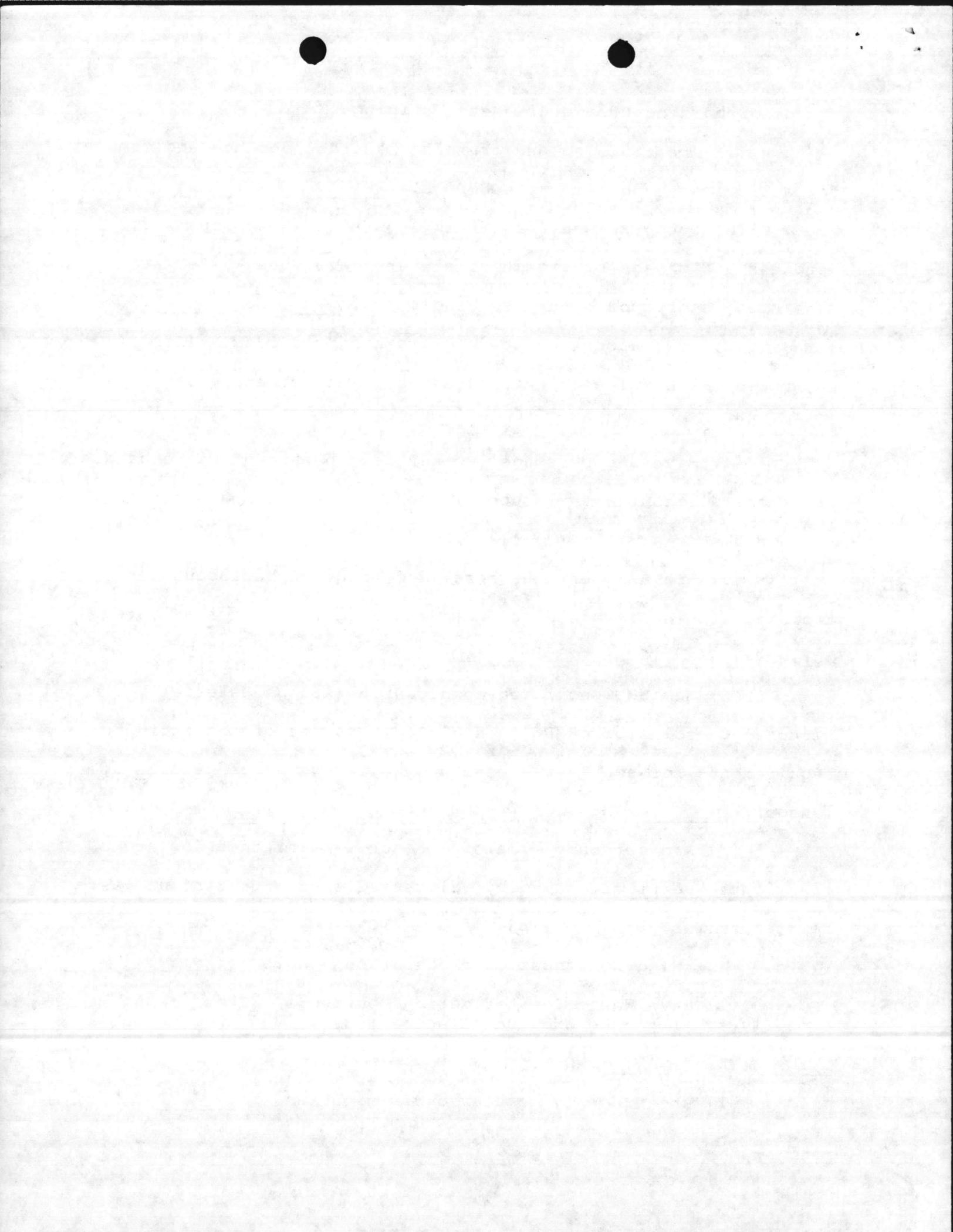
(6) Has HMDO notified cognizant Hazardous Material Disposal Coordinator (HMDC), in a timely manner of the training requirements for each newly assigned hazardous waste handler or manager? _____ YES _____ NO

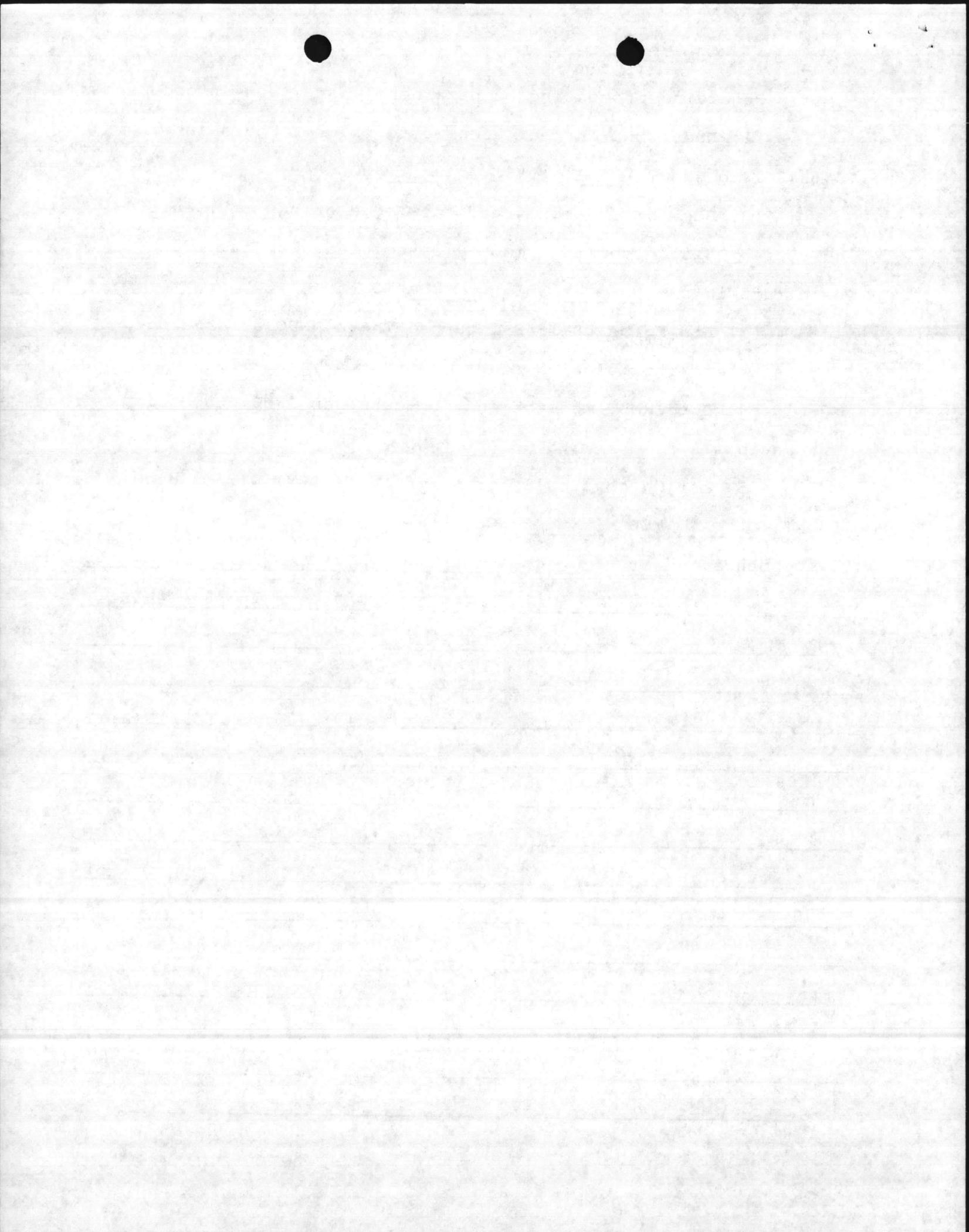
(7) Are personnel training records maintained for at least three years after individual is relieved of hazardous waste related duties? _____ YES _____ NO

h. Regarding notification of hazardous waste activity:

(1) Have Waste Identification Documents (WID's) been properly submitted to HMDC on all hazardous waste? (Ref. 6240.5A)
_____ YES _____ NO

(2) Are properly completed WID's on hand? _____ YES
_____ NO





Evaluation of Individual Hazardous Waste Generation, Handling and Storage/Accumulation Sites

1. Administrative:

a. Name of Site: _____

Organization in charge: _____

Responsible Official: _____

b. Adequacy of hazardous waste management standard operating procedures (SOP):

(1) Is a written SOP available? _____ YES _____ NO

(2) Does SOP provide names and phone numbers of current HMDO's and HMDC's? _____ YES _____ NO

(3) Does SOP contain the following?

(a) BO 6240.5A _____ YES _____ NO

(b) BO 11090.1B _____ YES _____ NO

(c) BO 11090.3 _____ YES _____ NO

(d) WID for each HW handled _____ YES _____ NO

(e) HM/HW Spill/Emergency Procedures _____ YES _____ NO

(f) Copies of weekly inspections _____ YES _____ NO

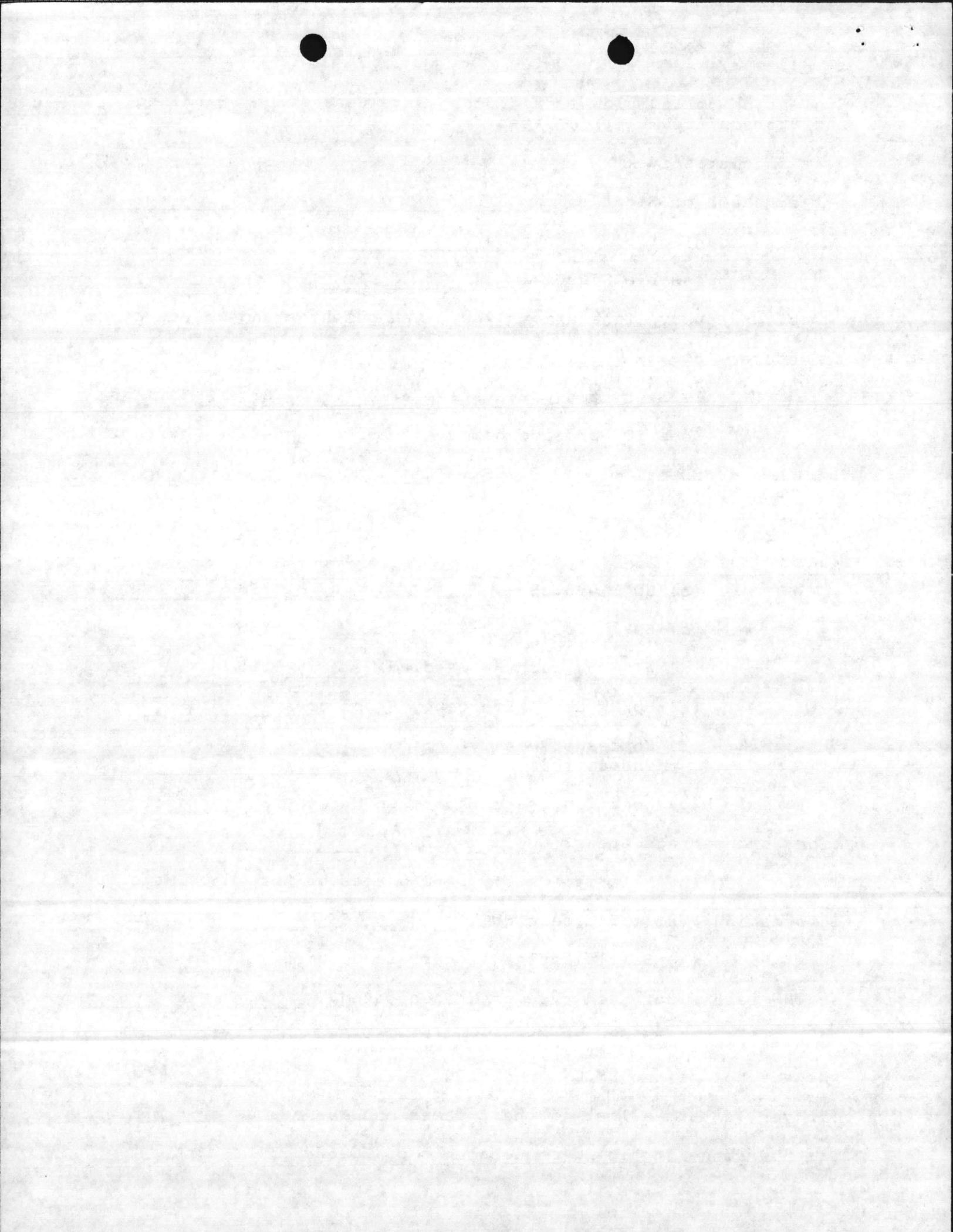
(g) Location sketch for each HW generation, accumulation, and storage areas? _____ YES _____ NO

(h) Material Safety Data Sheets or Hazardous Material Information System for each HW? _____ YES _____ NO

(i) Sample copies of turn-in documents (Form DD-1348-1) and HW labels for each type of HW generated? _____ YES _____ NO

c. Are there any HW handlers or managers working at the site who are not on the HMDO's roster? _____ YES _____ NO

(If yes, attach a list of their names and the status of compliance with personnel training requirements of BO 6240.5A)



DATE: _____

2. Condition of HW containers and related storage area

a. Do all HW containers have the words "Hazardous Waste" clearly spelled out? _____ YES _____ NO

b. Are contents of all containers clearly labeled? _____ YES
_____ NO

c. Is the accumulation date clearly marked on each HW container? _____ YES _____ NO

d. Is HW being removed from the site in less than 90 days?
_____ YES _____ NO

e. Condition of containers:

(1) Leaking drums _____ YES _____ NO

(2) Rusted drums _____ YES _____ NO

(3) Dented or bulging drums _____ YES _____ NO

(4) Are all container bungs or caps in place _____ YES _____ NO

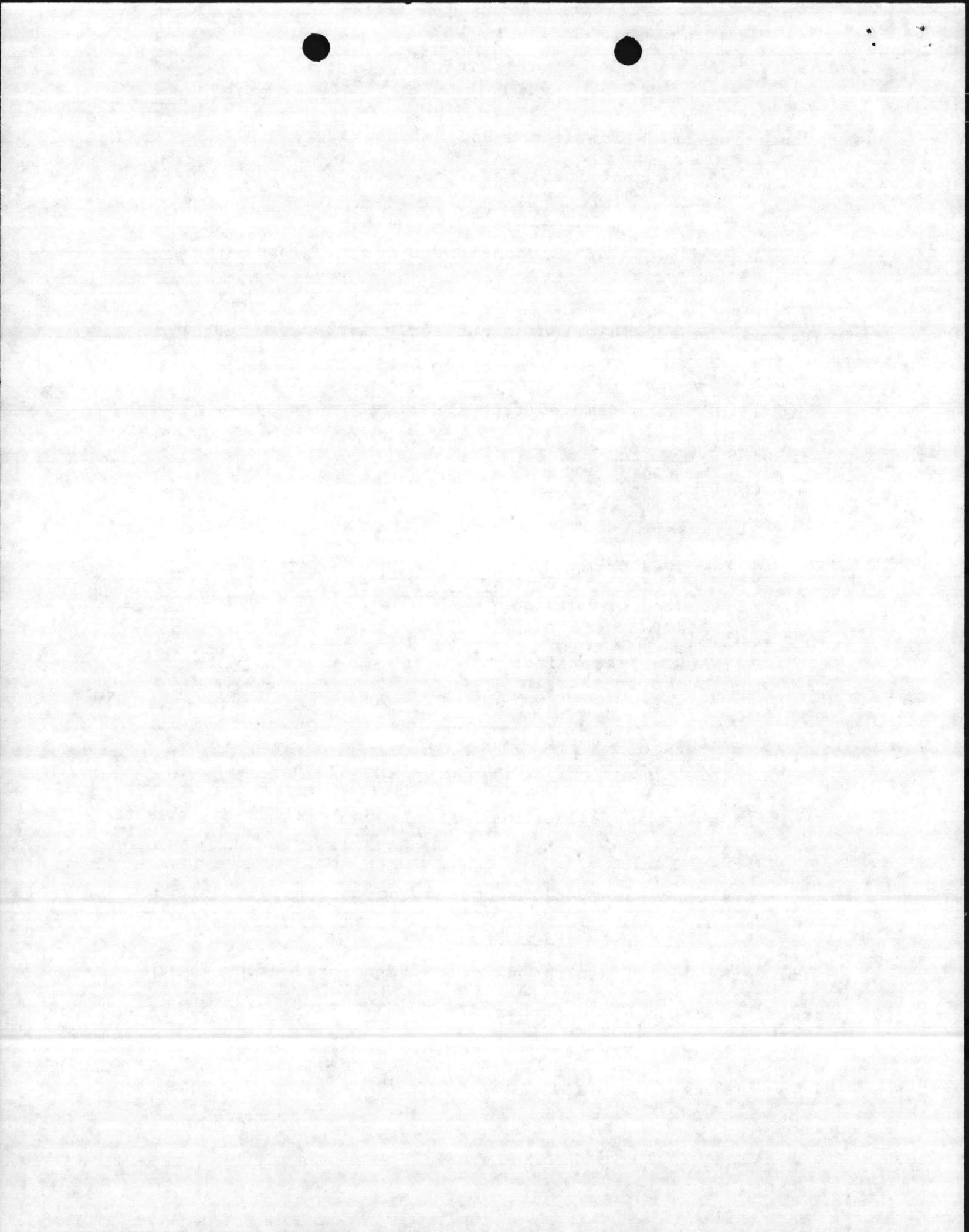
(5) Are covers for open top drums bolted in place _____ YES _____ NO

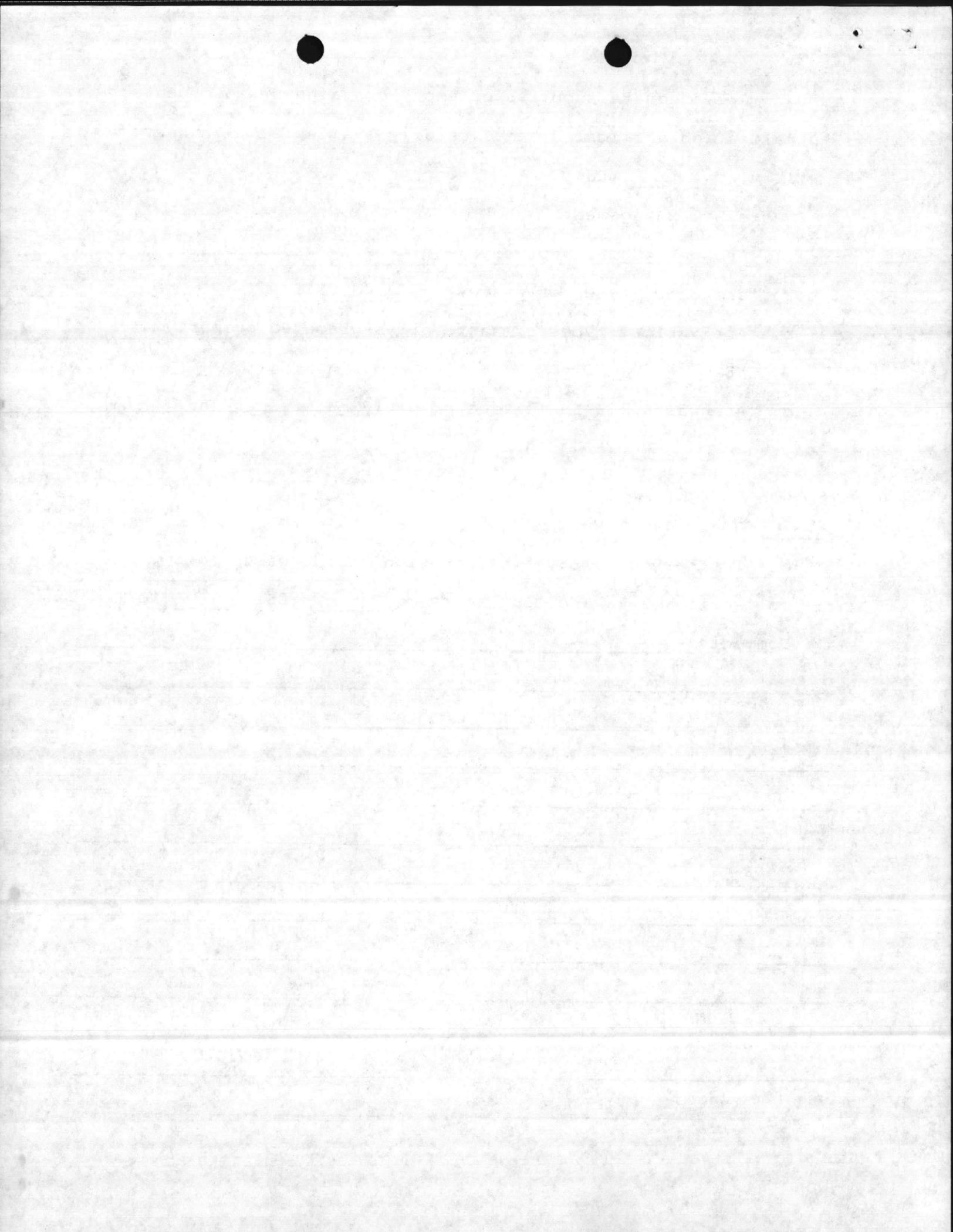
f. Is there any evidence of spills or leaks on the ground?
_____ YES _____ NO

g. Are contingency plans posted and currently updated at all sites? _____ YES _____ NO

h. Are weekly inspections of HM/HW being conducted and corrective action noted properly? _____ YES _____ NO

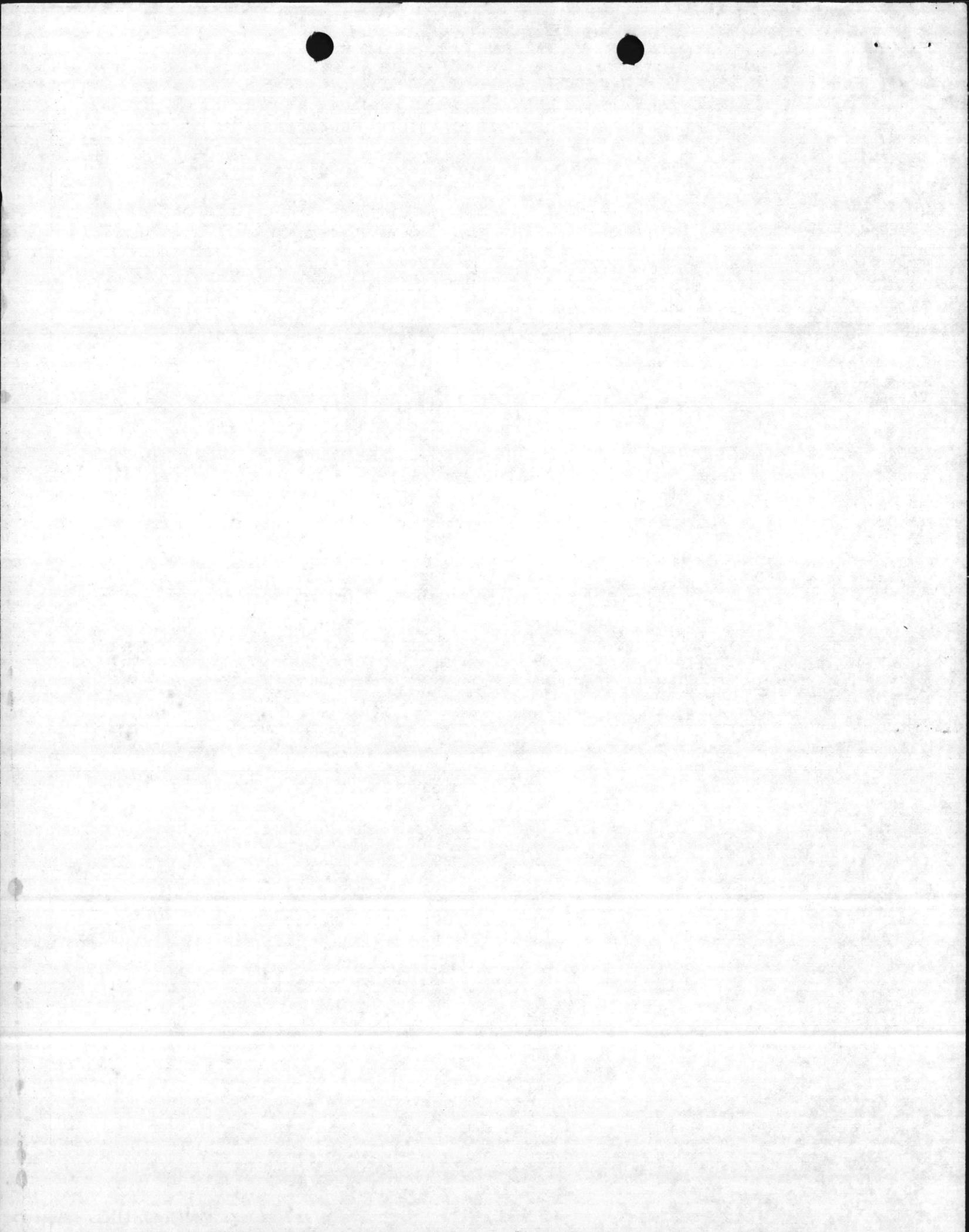
i. Are Spill Emergency Response signs posted? _____ YES
_____ NO (Ref. BO 11090.1B)





INSPECTION SCHEDULE FOR COMMANDS
ABOARD MARINE CORPS AIR STATION, NEW RIVER

<u>DATE</u>	<u>ORGANIZATION</u>	<u>BLDG. #</u>
Sep 22	Mag 26 HMT 204	AS-504
Sep 29	Mag 29 HMH 464	AS-4100
Oct 6	MWSS 272	AS-4157
"	MATCS 28	CG-1
Oct 28	MWCS 28 - Det A	AS-3502
"	NAMTD	222
Nov 3	HMH 362	AS-504



HAZARDOUS WASTE MANAGEMENT DIRECTORY

1.	Hazardous Material Disposal Coordinator	Division Engineer Bldg 422	2302, 2755
2.	Defense Reutilization & Marketing Office (DRMO)	Headquarters Bldg 906	5613
		HW Storage Facility Bldg TP-451	1369
3.	Natural Resources & Environmental Affairs, MCB	Environmental Branch Bldg 1103	5003, 2083
		Laboratory Bldg 65	5977
4.	Base Safety Officer	Bldg 1403	5725
5.	Base Fire Department	Chief, Headquarters <u>Emergencies Only</u> Bldg 18	5815 3333
6.	Base Traffic Management Officer	Headquarters	2541
		Harold Norris	3106
7.	PP&P, 2d Supply Bn	Bldg 915	5230, 1628, 5224
8.	Waste Oil Pickup	Heavy Equipment Base Maintenance	5909
9.	Utilities Director (Battery Acid)	Bldg 1202	5161

